

EXHIBIT B

1 A. Absolutely. As I said, some of them have been working
2 at this longer than I even knew what a voting system was and
3 have been concerned about these DREs and have done things like
4 worked on legislation in other states to get rid of them and
5 have successfully done so. So, yes, many of them have filed
6 complaints in Georgia here as well, or some of them have.

7 Q. Thank you.

8 MR. HEIDT: Nothing further, your Honor.

9 THE COURT: Ms. Burwell?

10 MS. BURWELL: I have nothing, your Honor.

11 THE COURT: Mr. Bryan?

12 MR. BRYAN: Yes, your Honor, a few questions.

13 CROSS-EXAMINATION

14 BY MR. BRYAN:

15 Q. Good afternoon, Ms. Marks.

16 A. Good afternoon.

17 Q. My name is Bennett Bryan, and I represent Maxine
18 Daniels and the DeKalb County Board of Elections. I have a few
19 questions for you.

20 A. Okay.

21 Q. My questions relate to -- first relate to your
22 membership. How does someone become a member of Rocky Mountain
23 Foundation?

24 A. Just by letting us know they would like to be on our
25 mailing list and get information from us. Of course, we would

1 welcome their donations but it is not necessary.

2 Q. Yes, ma'am. Now, is there any formal procedure?

3 A. No. We are pretty informal about that. We don't have
4 any reason to have a very formal procedure other than someone
5 giving me a call, sending me an email, talking to a friend
6 saying, "Sign me up. We want to get your information".

7 Q. And if there is no -- if there is no formal process,
8 how are you confident that the information your members give you
9 is accurate?

10 A. I can't quite imagine that somebody will give me their
11 mailing address and ask me to put them on our mailing list and
12 give me the wrong address. I'm willing to take their word for
13 their address.

14 Q. Now, are you familiar with -- actually, if you would
15 please refer to Plaintiff's Exhibit 18. You should have that up
16 there.

17 A. Okay. I have it.

18 Q. What is Plaintiff's Exhibit 18?

19 A. It is a list of three of our members who plan to vote
20 in the Georgia Congressional District Six election.

21 Q. How do you know that they intend to vote?

22 A. They have told me.

23 Q. But you didn't do any sort of background check on any
24 of the names listed on here to determine whether or not the
25 information they provided is accurate, did you?